



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS TX 75202-2733

November 30, 2015

Mr. Stuart Spencer  
Director  
Air Division  
Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

Dear Mr. Spencer:

This letter follows the overall programmatic end of year review of the ADEQ's Clean Air Act (CAA) air quality program. This review documents the state's progress toward meeting the negotiated 2015 work plan commitments in the Arkansas CAA, Sect. 105 Cooperative Agreement, as jointly reported by your staff and the U.S. Environmental Protection Agency Region 6.

We congratulate you and your staff for your hard work and commitment to protecting the air of the people of Arkansas. We sincerely appreciate your contribution to clean air goals and look forward to successfully partnering with ADEQ in 2016.

If you have any questions after reviewing the enclosures, please call me at (214) 665-7548.

Sincerely,

A handwritten signature in dark ink, appearing to read "Mark Hansen", is positioned above the printed name.

Mark Hansen  
Associate Director for Air  
Multimedia Division

Enclosures



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**National Goal 1:**

**Taking Action on Climate Change and Improving Air Quality.** Reduce greenhouse gas emissions and develop adaptation strategies to address climate change, and protect and improve air quality.

**National Objective 1.2:**

**Improve Air Quality.** Achieve and maintain health-based air pollution standards and reduce risk from toxic air pollutants and indoor air contaminants.

ADEQ Item #	SIP/Planning Activity	Output/Reporting Mechanism	Time Frame
1	<p>Develop and submit 2008 O<sub>3</sub>, 2010 NO<sub>2</sub> and SO<sub>2</sub> NAAQS infrastructure SIPs, subject to availability of implementation rules (or guidance as appropriate).</p> <p><b>ADEQ:</b> 2008 O<sub>3</sub>, 2010 NO<sub>2</sub>, and SO<sub>2</sub> NAAQS Infrastructure SIPs are still under development. Rulemaking required for this SIP not yet been finalized.</p> <p><b>EPA:</b> We appreciate ADEQ's work to develop these infrastructure SIPs, and look forward to the submittals.</p>	Periodic Planning Calls / Governor's Letter	9/30/15
2	<p>Continue to work on the development of a regional haze SIP revision that will correct the disapproved portions of the SIP and replace the regional haze FIP that EPA intends to promulgate</p> <p><b>EPA:</b> We appreciate ADEQ's efforts to develop a regional haze SIP revision and will work with the State to ensure the SIP revision submitted is approvable.</p>	Periodic Planning Calls	Ongoing

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ADEQ Item #	SIP/Planning Activity	Output/Reporting Mechanism	Time Frame
3	<p>Develop and submit a SIP revision addressing Regional Haze 5-year progress report requirements.</p> <p><b>ADEQ:</b> Final 5-year progress report mailed to EPA on 6/3/2015.</p> <p><b>EPA:</b> We appreciate ADEQ's submission of the 5-year Regional Haze progress report.</p>	Periodic Planning Calls/SIP Submittal	Ongoing. Will be due during FY-2015.
4	<p>Work with Region 6, as necessary, to implement local, voluntary ozone &amp;/or PM reductions programs (i.e. Ozone Advance / PM Advance) to help achieve or maintain attainment of 2008 8-hour ozone NAAQS and 2006 and 2012 PM NAAQS.</p> <p><b>EPA:</b> We appreciate ADEQ's efforts to implement voluntary reductions programs, and we invite ADEQ to use the resources available on the Advance website: <a href="http://www3.epa.gov/ozoneadvance/index.html">http://www3.epa.gov/ozoneadvance/index.html</a>.</p>	Periodic Planning Calls	Ongoing
5	<p>Work with Region as necessary to address 110(a)(2) requirements for PM<sub>2.5</sub>.</p> <p><b>ADEQ:</b> Rulemaking required to address 110(a)(2) requirements for PM<sub>2.5</sub> is underway but has not yet been finalized. An infrastructure SIP for PM<sub>2.5</sub> is under development.</p> <p><b>EPA:</b> We appreciate ADEQ's efforts to address 110(a)(2) for PM<sub>2.5</sub>.</p>	Periodic Planning calls and end-of-year review	9/30/14

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ADEQ Item #	SIP/Planning Activity	Output/Reporting Mechanism	Time Frame
6	<p>Work with EPA to address any issues raised related to submitted "Threshold Revision" SIP</p> <p><b>ADEQ:</b> A monitoring based demonstration has been submitted to EPA for review to support the Threshold Revision SIP. Regional modeling is also being conducted in support of Threshold Revision SIP.</p> <p><b>EPA:</b> We appreciate ADEQ's additional demonstration completed in support of the Threshold Revision SIP. We look forward to working with ADEQ as we review the additional information. We also look forward to the receipt of the referenced regional modeling.</p>	Periodic Planning Calls	Ongoing
7	<p>Submit draft, proposed, and/or final SIPs, equivalency demonstrations, and/or delegation requests, as necessary, in response to revisions to NSR rules.</p> <p><b>ADEQ:</b> ADEQ is developing an approach to include in a SIP submission to address revisions to NSR rules.</p> <p><b>EPA:</b> We appreciate ADEQ's commitment to develop SIP revisions in a timely fashion in response to NSR rule revisions.</p>	Submission to EPA	Ongoing / Within timeframes specified in CAA / federal rules

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ADEQ Item #	SIP/Planning Activity	Output/Reporting Mechanism	Time Frame
8	<p>Work with Region 6, as appropriate and resources allow, to administer and implement the Diesel Emission Reduction grant program.</p> <p><b>ADEQ:</b> ADEQ is administering and implementing the Diesel Emission Reduction grant program through its GoRED! Program. ADEQ received a one-year extension on the FY2014 grant and will continue to administer and implement this program in FY 2016.</p> <p><b>EPA:</b> We appreciate ADEQ's commitment and continued efforts to administer and implement the Diesel Emission Reduction grant program.</p>	Periodic Planning Calls / EOY Review	Ongoing
9	<p>Submit revisions to the SIP, as necessary, within time frame allowed by federal rules.</p> <p><b>ADEQ:</b> In progress</p> <p><b>EPA:</b> We look forward to receiving the revisions.</p>	SIP Submittal	As needed / Within timeframes specified in CAA / federal rules
10	<p>Implement applicable requirements of the approved SIP</p> <p><b>ADEQ:</b> Ongoing</p> <p><b>EPA:</b> We appreciate ADEQ's continuing work to implement the SIP.</p>	Periodic Planning Calls / EOY Review	Ongoing

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ADEQ Item #	SIP/Planning Activity	Output/Reporting Mechanism	Time Frame
11	<p>Develop applicable 111(d) plans and request approval or submit negative declaration, as appropriate</p> <p><b>ADEQ:</b> Investigating a strategy for Arkansas and resuming stakeholder meetings Oct. 9, 2015</p> <p><b>EPA:</b> We appreciate ADEQ's commitment and continued efforts towards meeting applicable requirements.</p>	<p>Periodic Planning Calls</p> <p>EOY Review</p>	Ongoing
12	<p>Review and concur on conformity determination revisions for non-attainment and maintenance areas for transportation related criteria pollutants (e.g., ozone, CO, PM<sub>2.5</sub>, PM<sub>10</sub>).</p> <p><b>EPA:</b> We appreciate ADEQ's continued commitment to transportation conformity and the interagency consultation process.</p>	<p>Conformity determination</p>	As necessary
13	<p>Review air quality reports and take appropriate actions dealing with new areas violating attainment of any of the NAAQS.</p> <p><b>ADEQ:</b> Ongoing</p>	<p>Periodic Planning Calls /</p> <p>EOY Review</p>	Ongoing

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ADEQ Item #	SIP/Planning Activity	Output/Reporting Mechanism	Time Frame
14	Consult with and provide assistance to transportation agencies in maintenance areas to update emission inventory budgets as necessary and review transportation plans to ensure compliance with the SIP.  EPA: We appreciate ADEQ's continued commitment to transportation conformity and the interagency consultation process.	Participation in interagency consultation process	As necessary
15	Participate in consultation and evaluation of project-specific emissions, in accordance with general conformity requirements.  EPA: We appreciate ADEQ's continued commitment to general conformity and the interagency consultation process.	Participation in interagency consultation process	As necessary
16	Continue to work with Region 6 regarding delegation of portions of Part 112 Standards.	Periodic Calls	Ongoing

ADEQ Item #	Monitoring Activity	Output/Reporting Mechanism	Time Frame
17	Report real time ozone, NO <sub>2</sub> , SO <sub>2</sub> and PM <sub>2.5</sub> , to AirNOW for cities required to report the AQI (state/local only).  ADEQ: Data reported in a timely manner	AirNow	Ongoing [present target is within 20 minutes; long-term goal is 5 minutes]



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ADEQ Item #	Monitoring Activity	Output/Reporting Mechanism	Time Frame
18	Notify 6PD-Q prior to establishing, modifying, relocating, or discontinuing any monitor and/or site.  ADEQ: No changes were made in the network. Upcoming changes addressed in the ANR	Letter	30 days prior to change
19	Conduct quarterly QA checks for flow rates of PM <sub>2.5</sub> Pb monitors.  ADEQ: Completed on schedule	AQS	Quarterly
20	Consider expanding air quality reporting and forecasting to additional cities, including particle pollution forecasting.  ADEQ: No additional forecasting anticipated at this time	AirNow	On-going
21	Certify 2014 NAAQS pollutant data in AQS and provide supporting documentation.  ADEQ: Data certified by ADEQ	Letter with appropriate AQS reports	5/1/14
22	Submit 2015 annual network plan required by 40 CFR § 58.10. The plan should address new applicable NAAQS monitoring requirements.  ADEQ: ANR submitted on July 16, 2015	Network Assessment	07/01/14 (or as determined by alternate approved schedule)
23	Produce quality data and submit updated Quality Management Plan every five years or when major changes occur and Quality Assurance Project Plans annually or when major changes occur.  ADEQ: QAPP submitted and approved	QMP and QAPP's	60 days before expiration

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ADEQ Item #	Monitoring Activity	Output/Reporting Mechanism	Time Frame
24	<p>Submit all monitoring data including criteria and QA to AQS, according to schedule in 40 CFR Part 58. The target data completeness rate is 75% of the potential concentration values based on the operating EPA-funded state/local monitors and their sampling schedule. Target for QA data is 75% of checks required by 40 CFR 58.</p> <p>ADEQ: Target dates met</p>	AQS	<p>Quarterly, no later than 90 days after the end of the calendar quarter</p> <p>CY 14 Q3 12/31/14 CY 14 Q4 03/31/15 CY 15 Q1 06/30/15 CY 15 Q2 09/30/15</p>
25	<p>Notify EPA Region 6 of any situation (such as monitor malfunction or data validation issue) that results in missing continuous data of more than 120 consecutive hours or two consecutive non-continuous samples and identify the corrective action taken to minimize the loss of data.</p> <p>ADEQ: Emailed as needed</p>	Letter or Email	As soon as possible, but no more than 14 days after the event
26	<p>Address and work with R6 to resolve any exceptional events.</p> <p>ADEQ: No exceptional events occurred</p>	Data flagging in AQS, letter of notification to Region & Exceptional Event Demonstration	As necessary based on the submittal, notification, and timeline requirements in the Exceptional Events Rule's Sec. 50.14(c)
27	<p>Operate monitors for NAAQS pollutants, NCore, and PM speciation according to 40 CFR Part 58, approved monitoring plans, and/or grant agreements including QMPs and QAPPs.</p> <p>ADEQ: Goal met</p>	End-of-year review	9/30/15

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ADEQ Item #	Monitoring Activity	Output/Reporting Mechanism	Time Frame
28	Report data from operational NCORE multi-pollutant precursor gas monitoring sites to AQS. <a href="#">ADEQ</a> : Date entered	End-of-year review	9/30/15

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ADEQ Item #	Permitting Activity	Output/Reporting Mechanism	Time Frame
29	<p>Maintain Minor NSR applications information on the ADEQ website per agreement with Region 6. Provide this information to Region 6 upon request.</p> <p><b>ADEQ:</b> I am not sure what information this is. There have been several discussions related to minor sources.</p> <p><b>EPA:</b> We appreciate ADEQ's timely responses to our requests for Minor NSR permit application documents and that the online permit application database is updated in a timely fashion and easy to navigate.</p>	As requested	Ongoing
30	<p>Respond to EPA's concerns on implementation of NSR program.</p> <p><b>ADEQ:</b> There are no known concerns at this time</p> <p><b>EPA:</b> We appreciate ADEQ's participation in monthly air permitting conference calls to discuss any current questions or concerns that may exist related to the NSR program.</p> <p>As discussed during monthly conference calls and noted in EPA'S comments on draft permits, we continue to have concerns related to the issuance of Minor NSR permits that do not include an adequate NAAQS demonstration as part of the permit record. We look forward to continue working with ADEQ regarding this concern to ensure the NSR program is implemented consistent with federal requirements.</p>	Monthly conference call	Within 90 days of notice from EPA

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ADEQ Item #	Permitting Activity	Output/Reporting Mechanism	Time Frame
31	<p>Issue 78% of major NSR permits within one year of receiving a complete permit application.</p> <p><b>ADEQ:</b> In the last fiscal year, all NSR permit were issued within one year</p> <p><b>EPA:</b> We appreciate ADEQ's commitment to issuing major NSR permits in a timely fashion and exceeding the target goal for permit issuance.</p>	End-of-year review	09/30/15
32	<p>Provide timeliness data on NSR permits issued for new major sources and major modifications by entering data including "the application accepted date" and "the permit issuance date" into the RBLC national database.</p> <p><b>ADEQ:</b> On-going. Recently we have noticed our data was not uploaded by the RBLC. We are currently auditing all data to make sure it is complete.</p> <p><b>EPA:</b> We appreciate ADEQ's initiative to review the current RBLC database to confirm data inclusion for their permit actions and for working with EPA's RBLC contacts to add any missing data.</p>	End-of-year review	09/30/15

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ADEQ Item #	Permitting Activity	Output/Reporting Mechanism	Time Frame
33	<p>Issue NSR permits consistent with CAA requirements.</p> <p><b>EPA:</b> We appreciate ADEQ's participation in monthly air permitting conference calls to discuss any issues related to specific NSR permit actions.</p> <p>As discussed, EPA continues to have concerns regarding the issuance of some NSR permits, specifically Minor NSR permits because of the lack of NAAQS demonstration as part of the permit record. We look forward to continue working with ADEQ to address this concern and to ensure that all NSR permits are issued consistent with CAA requirements</p>	<p>Monthly conference calls; End-of-year review</p>	<p>Ongoing</p>
34	<p>Enter BACT/LAER determination in the RBLC</p> <p><b>ADEQ:</b> This can be combined with #32. Same comment.</p> <p><b>EPA:</b> See response in #32.</p>	<p><a href="http://mapsweb.rtpnc.epa.gov/RBLCWebbd/bb/102.htm">http://mapsweb.rtpnc.epa.gov/RBLCWebbd/bb/102.htm</a></p>	<p>BACT/LAER database entry within 30 days of final permit issuance.</p>

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ADEQ Item #	Permitting Activity	Output/Reporting Mechanism	Time Frame
35	<p>Initiate revisions to existing state regulations to ensure permits contain appropriate controls to implement EPA's NAAQS standards including but not limited to NO<sub>2</sub> 1- Hr. standard, SO<sub>2</sub> 1-Hr. standard, and PM<sub>2.5</sub> standard. Also, work to ensure permits contain appropriate controls to implement the EPA NAAQS standards.</p> <p><b>ADEQ:</b> This is an on-going activity carried out by the planning branch.</p> <p><b>EPA:</b> We look forward to working with ADEQ as they continue to develop the necessary revisions to the state rules and SIP. We appreciate ADEQ's participation in monthly air permitting conference calls providing the opportunity to discuss current permit actions and the associated NAAQS demonstration requirements.</p>	EOY Review	Ongoing
36	<p>Provide Major NSR (PSD and nonattainment NSR) permit applications and minor NSR permits applications, as requested by Region.</p> <p><b>ADEQ:</b> On-going. No known issues.</p> <p><b>EPA:</b> We appreciate ADEQ's timely responses to our requests for Minor NSR permit application documents and observe that the availability of Major NSR permit application documents on the ADEQ website aids in our ability to easily access application documents.</p>	Copy of applications and draft permits	As required

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ADEQ Item #	Permitting Activity	Output/Reporting Mechanism	Time Frame
37	<p>Provide draft Title V and Major NSR (PSD and Nonattainment NSR) permits to EPA.</p> <p><b>ADEQ:</b> On-going. No known issues.</p> <p><b>EPA:</b> We appreciate ADEQ's commitment to provide these draft permit documents for our review in a timely fashion.</p>	Copy of draft permits	Ongoing
38	<p>Make case-by-case MACT determinations for all applicable sources under Section 112(g), including appropriate compliance monitoring measures, as appropriate</p> <p><b>ADEQ:</b> On-going. No determinations necessary last fiscal year.</p> <p><b>EPA:</b> We appreciate ADEQ's commitment to complete case-by-case MACT determinations, as needed.</p>	Implement 40 CFR 63 process requirements	As appropriate



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ADEQ Item #	Emission Inventory Activity	Output/Reporting Mechanism	Time Frame
39	<p>Submit the 2013 State-wide emission inventories for criteria pollutants required by EPA's air emission reporting requirements, via CDX, for large point sources.</p> <p><b>ADEQ:</b> Final submittal completed by ADEQ 10/15/14. Facility inventory data was submitted to EIS 10/6/14. Point inventory data was submitted to EIS 10/15/14.</p> <p><b>EPA:</b> We appreciate ADEQ's continued work to collect, quality assure and submit emissions data to the national database.</p>	Submittal to NEI	12/31/14

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ADEQ Item #	Emission Inventory Activity	Output/Reporting Mechanism	Time Frame
40	<p>Submit available 2013 toxics inventories for large point sources via CDX.</p> <p><b>ADEQ:</b> TRI (Toxic Release Inventory) data is collected by the Arkansas Department of Emergency Management (ADEM) in the State of Arkansas</p> <p><b>EPA:</b> We reviewed the National Emission Inventory System (NEI) which indicated that some air toxics data was submitted by ADEQ and discussed the submittal with ADEQ staff. We appreciate that ADEQ was able to provide available 2013 emissions data on air toxics that were permitted by the State into the NEI.</p>	Submittal to NEI	12/31/14
41	<p>Review and quality assure the integrated 2013 NEI for Hazardous Air Pollutants (HAP) and Criteria Air Pollutants (CAPs), as appropriate.</p> <p><b>ADEQ:</b> Review and Quality Assurance of 2013 NEI HAP and CAP data was completed by ADEQ on 10/15/14</p> <p><b>EPA:</b> We appreciate ADEQ's work to ensure the quality of emissions data.</p>	End-of-year review	09/30/15
42	<p>Quality assure, validate, and revise NEI facility data using EIS components.</p> <p><b>ADEQ:</b> Quality Assurance, validation, and revision of NEI facility data using EIS QA reports was conducted by ADEQ between 8/13/14 and 10/15/14.</p> <p><b>EPA:</b> We appreciate ADEQ's work to ensure the quality of the facility data in the EIS.</p>	End-of-year review	9/30/15

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ADEQ Item #	Enforcement/Surveillance Activity	Output/Reporting Mechanism	Time Frame
43	<p>Submit a Compliance Monitoring Strategy (CMS) or an update to the strategy, including the number of Major and 80% SM sources consistent with the revised Clean Air Act Stationary Source Compliance Monitoring Strategy dated July 14, 2014</p> <p><b>ADEQ:</b> Completed</p> <p><b>EPA:</b> ADEQ submitted the CMS Plan for FY15 via a letter dated November 7, 2014, which completed this activity.</p>	AFS/Inspection Reports until AFS phase-out. Then reporting mechanism will be ICIS-Air/Inspection Reports	Annually
44	<p>Complete the universe of planned inspections/document findings consistent with the compliance monitoring strategy (CMS). Include:</p> <ul style="list-style-type: none"> <li>Identify universe of Majors and 80% SM</li> <li>Complete other compliance monitoring inspections (e.g. PCEs)</li> </ul> <p><b>ADEQ:</b> Completed</p> <p><b>EPA:</b> We appreciate ADEQ's work to conduct FCEs in accordance with the CMS Policy and with the FY15 CMS Plan submitted.</p>	AFS/Inspection Reports	Data input Ongoing
45	<p>Report High Priority Violations (HPV) to EPA in a timely manner consistent with HPV Policy.</p> <p><b>ADEQ:</b> Done during monthly HPV Conference Call</p> <p><b>EPA:</b> We appreciate ADEQ's participation in monthly HPV conference calls to discuss any issues related to taking timely and appropriate enforcement action(s) pursuant to the HPV Policy.</p>	HPV conference call	Monthly

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ADEQ Item #	Enforcement/Surveillance Activity	Output/Reporting Mechanism	Time Frame
46	<p>State compliance monitoring and enforcement actions are conducted in accordance with federal minimum standards, state law and regulations.</p> <p>ADEQ: Ongoing as necessary</p> <p>EPA: We appreciate ADEQ's ongoing work to conduct all inspections and pursue enforcement actions in accordance with Federal and state laws, regulations &amp; policies.</p>	As required	Ongoing
47	<p>Enter all required and accurate minimum data requirements into AIRS</p> <ul style="list-style-type: none"> <li>Review Database to ensure minimum data requirements are being entered into AFS</li> <li>Review CMRs to ensure accurate minimum data requirements are being entered into AFS</li> </ul> <p>ADEQ: Ongoing as data is entered</p> <p>EPA: We appreciate ADEQ's continued work to enter, track and quality assure enforcement and compliance data to the national database, ICIS-Air.</p>	<p>AFS/HPV conference call until AFS phased-out. Then mechanism will be ICIS-Air/HPV Conference Calls.</p>	<p>Monthly</p> <p>Ongoing</p>